



MEMO ENDORSED

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

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LAW DEPARTMENT
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December 14, 2022

VIA ECF

Honorable Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Mosby v. City of New York et al., 20 CV 1485 (SHS)

Your Honor:

I am the Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing the defendants in the above-referenced matter. Defendants write to respectfully request an extension of time for the parties to file motions *in limine* in this matter from December 15, 2022 to December 29, 2022; to file the joint pre-trial order (“JPTO”) in this matter from December 19, 2022 to December 30, 2022 as well as request corresponding extensions for the parties’ remaining pretrial filing deadlines. (See Civil Docket No. 54, Court Order filed November 8, 2022). This is the first request for an extension of time to file the pretrial documents in this matter. The undersigned has conferred with plaintiff’s counsel, Cyrus Joubin, who consents to the aforementioned extension requests. The final pre-trial conference in this matter is set for January 9, 2023 and trial is scheduled to commence on January 17, 2023. (*Id.*).

An extension is required due to the fact that the undersigned was recently participating in an Eastern District trial in the case Martinez v. City of New York, et al., 16 CV 00079 (NRM)(CLP), which commenced on November 30, 2022, and recently concluded yesterday December 13, 2022. While the undersigned has been working diligently to draft the motions *in limine*, JPTO, and other pretrial filings in this matter, additional time is now required due to the undersigned’s recent two-week participation as trial counsel in the Martinez matter.

Therefore, defendants respectfully request an extension of the following pretrial filing deadlines:

	Current Deadline	Proposed Deadline
Deadline to file motions <i>in limine</i> .	December 15, 2022	December 29, 2022
Deadline to file opposition papers to motions <i>in limine</i> .	December 22, 2022	January 4, 2023
Deadline to file proposed joint pretrial order.	December 19, 2022	December 26, 2022
Deadline to file proposed <i>voir dire</i> , jury charge, and verdict sheet.	December 19, 2022	December 30, 2022
Deadline to deliver all documentary exhibits to the Court.	December 22, 2022	January 4, 2023

Thank you for your consideration of the matters herein.

Respectfully submitted,

/s/ Morgan C. McKinney
Morgan C. McKinney, Esq.
Senior Counsel

cc.: **VIA ECF**
Cyrus Joubin, Esq.
Attorney for Plaintiff

12/14/2022 ✓
So ordered.
No further adjournments of any date.
S. J. J. 12/14/2022
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